

Meraki Management, LLC. V. Andrew Corona

(LT 22-1765)

2:23-cv-334

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

PLAINTIFF:

**Meraki Management, LLC.
3500 Brooktree Road, Suite 203
Wexford, PA 15090**

**Counsel of Record for Defendant:
David M. Tkacik, Esq.
Tkacik Law Office, P.C.
9000 Brooktree Rd., Suite 205
Wexford, PA 15090
412-449-0100
DTkacik@TkacikLawOffice.coM**

VS.

DEFENDANT:

**Andrew Corona
3457 EVERGREEN ROAD, APT 103
PITTSBURGH, PA 15237
814-318-2206
AndrewCoronaNCMA@Gmail.com**

CIVIL DIVISION

CASE NUMBER:

LT - 22- 001765

TYPE OF PLEADING:

**Notice of Removal
&
Demand for JURY TRIAL**

FILED ON BEHALF OF:

Andrew Corona

- ☐ COUNSEL OF RECORD
☒ INDIVIDUAL, IF PRO SE

REQUIRED INFORMATION:

**Andrew Corona
3457 EVERGREEN ROAD, APT 103
PITTSBURGH, PA 15237
814-318-2206
AndrewCoronaNCMA@Gmail.com**

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(LT 22-1765) 2:23-cv-334

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

<u>PLAINTIFF:</u> Meraki Management, LLC. V.	Arbitration Division
<u>DEFENDANT:</u> Andrew Corona	CASE NUMBER:
	LT - 22-1765
	TYPE OF PLEADING:
	Notice of Removal & Demand for JURY TRIAL

Remove Case to Federal Court AND Demand for Jury Trial

And Now, comes, Andrew Corona, Pro Se, Defendant and file this motion to remove case to Federal Court, pursuant to **Federal Question Jurisdiction**. And Demand for Jury Trial.

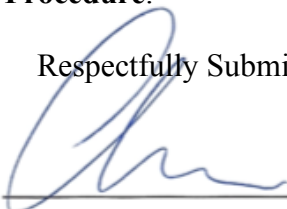
1. Plaintiff States in motion: “LT 22-1785 and AR 22-4185” are the same parties, facts and legal issues.” (*Paragraph 1-5 in Motion summary by Plaintiff*).
2. Pursuant to the guidelines of “Federal Question” as follows as alleged against Plaintiff:
 - a. Federal Laws govern alleged;
 - b. Alteration of evidence in the LT 22-1765, Resulted in the “Civil Complaint”.
 - c. Fraudulent manner in which Balance on account was generated, as related to Fair-Debt-Collection-Practices-Act.
 - d. Discrimination of the Defendant, against a person with disabilities covered by the Americans with Disabilities act “ADA”, AND Federal Equal Housing Opportunity, “FHEO”, AND the constitution of the United States of America.
 - e. Discrimination in relation to a service animal protected by federal law.
 - f. Collection of fees in relation to Paragraph d.

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- g. Retaliation on a complainant to a federal program.
 - h. Lost wages.
 - i. Defamation, by bringing forth a false claim of non-payment.
 - j. Defamation, by posting on my residence a Landlord/Tenant issue that was brought forth by an altered documentation in the attempt to collect a non-existent, fraudulent debt.
 - k. Presentation of an alter document to a civil servant, as a true document.
 - l. Other Claims as follows:
 - i. Defendants, Loss of trust in finding housing in the Commonwealth of Pennsylvania.
 - ii. Defendants, Loss in trust in finding Employment until released by Mental Health professionals.
 - iii. Due to the need of additional therapy sessions regarding Paragraphs a-l and Paragraphs i-iii. In their entirety.
3. Defendant **Demands** Jury Trial as stated in the Default Motion Filed against Plaintiff on the 30th of December 2022.

WHEREFORE, Andrew Corona, Pro Se, Respectfully requests that the Honorable Court enter an Order in each docket Consolidating at AR 22-4185, and the cancellation of the arbitration hearing on the 30th of March 2023. And the Removal of this case to Federal Court. Further, signs pursuant to **Rule 11** of the **Federal Rules of Civil Procedure**.

Respectfully Submitted,



Andrew B. Corona, Pro Se

Date: January 16, 2023